

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

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In re POLYURETHANE FOAM ANTITRUST LITIGATION)	
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)	MDL Docket No. 2196
)	Index No. 10-MD-2196 (JZ)
)	
This document relates to:)	
)	
)	
ALL DIRECT PURCHASER (CLASS) CASES)	
)	
)	

Defendants Domfoam International Inc. and Valle Foam Industries (1995) Inc. (together the “Domfoam Defendants”) respectfully submit this memorandum in support of the pending motion by Plaintiffs for approval of a plan of notice for the settlement between Plaintiffs and the Domfoam Defendants (as well as notice for a settlement between Plaintiffs and the Vitafoam Defendants).

The Domfoam Defendants have reviewed and given input on the proposed form of notice, and the Domfoam Defendants believe the proposed form of notice accurately describes the Domfoam Settlement and is consistent with the previous orders of this Court concerning the Domfoam Settlement and notice thereof.

The Domfoam Defendants therefore respectfully request that the Court approve Plaintiffs' proposed notice plan.

DATED: June 18, 2012

Respectfully submitted,

/s/ Shepard Goldfein
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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2012, a copy of the foregoing Memorandum was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipts. Parties may access this filing through the Court's system.

/s/ Elliot A. Silver

Elliot A. Silver

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